

THE HARMAN FIRM, LLP

Attorneys & Counselors At Law
www.theharmanfirm.com

May 13, 2016

VIA ECF

Magistrate Judge Cathy L. Waldor
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07101

Re: *Carmen Castro v. Pratt Industries, Inc. et al.*, 15 CV 0188

Dear Judge Waldor:

This firm represents Plaintiff Carmen Castro in the above-referenced employment action. We write on behalf of the Parties to respectfully request an extension of fact discovery. The next status teleconference in this matter is on June 17, 2016.

During the Court's March 30, 2016 Court conference, Your Honor stated the Court would grant the Parties additional time to complete fact discovery, should the Parties require it. The Parties require additional time for Defendants to produce their discovery responses and production and for party depositions to occur. Discovery has been extended twice previously as a result of Plaintiff's prior counsel's failure to produce written discovery.

Defendants have agreed to produce their discovery responses by May 27 and party depositions will occur in June. Defendants have agreed to produce two witnesses for deposition that work and reside out-of state but have agreed to appear in New Jersey. Thus, based on the Parties' and attorney's availability, the Parties respectfully request a sixty-day extension (until July 15, 2016) to complete fact discovery.

We thank the Court for its time and attention to this matter.

Respectfully submitted,


Edgar M. Rivera

cc: Curtis G. Fox, Esq. [via ECF]
Sharon P. Margello, Esq. [via ECF]

220 Fifth Avenue, Suite 900
New York, New York 10001
T 212 425 2600 F 212 202 3926